

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**  
**ROSHA NICOLE DAVIS**

**CHAPTER 13  
CASE NO.: 23-02655-JAW**

**DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN**

**COMES NOW** Debtor, by and through counsel, in the above filed and numbered case and moves to modify the Chapter 13 Plan for reasons to be shown below:

1. The Debtor's Chapter 13 Plan was confirmed by Order of this Court (DKT # 23) entered on February 26, 2024.
2. That Debtor's confirmed Chapter 13 Plan provides for a total payment of \$3,150.00 at 7% interest to be paid to OneMain for a 2007 Lexus 350RX.
3. The 2007 Lexus 350RX was involved in a motor vehicle accident and has been declared a total loss. The responsible party's insurance carrier will provide payment to the Chapter 13 Trustee for the said vehicle. On information and belief, the Morgan & Morgan law firm is currently in possession of the property damage insurance proceeds.
4. Debtor moves to Modify the Confirmed Plan to abandon the 2007 Lexus 350RX, with no further plan payments to OneMain.
5. The wage order should be amended and reduced to reflect no further distributions OneMain.

**WHEREFORE**, Debtor requests that this Motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order Sustaining Debtor's Motion to Modify, and for such other further relief as this Court may deem proper and just.

DATED: May 22, 2025

/s/ Michael G. Pond  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the above referenced debtors, do hereby certify that I have this date served a true and correct copy of the foregoing Debtors' Motion to Modify Plan on the affected creditors via First Class mail postage pre-paid, the case trustee, and the U. S. Trustee via Notice of Electronic Filing (NEF) through the ECF system to:

Chapter 13 Trustee-Torri Parker Martin

U. S. Trustee

OneMain Financial Group, LLC  
P O Box 3251  
Evansville, IN 47731-3251

DATED: May 22, 2025

/s/ Michael G. Pond  
Attorney for Debtor

Michael G. Pond  
MS Bar # 08751  
1650 Lelia Dr., Ste 101  
Jackson, MS 39216  
601-948-4878  
mailforward@pondlawoffice.com